From: Ted Selb
Sent: Wednesday, June 29, 2005 11:05 AM
To: Dabbs, Paul
Subject: Comments on CA Water Plan Update 2005 - Draft

Paul Dabbs
Statewide Planning Branch
California Department of Public Works
P. O. Box 942836
Sacramento, CA 94236-0001

Dear Mr. Dabbs:

Following review of the subject draft document(s), the Merced ID has the following comments pertaining to the same paragraph found in two sections as follows: (1) California Water Plan Update 2005, Volume 3 - Regional Reports, Chapter 7, San Joaquin River Hydrologic Region, State of the Region - Challenges section, (Page 7-6, Paragraph 3); and (2) California Water Plan Update 2005, Volume 4 - Reference Guide, California Water Quality in 2004, San Joaquin River section (Page 14, Pagaraph 3); both of which state:

"Migrating and spawning salmonids face high temperatures in the Stanislaus, Tuolumne, and Merced rivers downstream from dams. Contaminated fish are a concern in these three rivers and the main stem of the San Joaquin River.
One study found the 43-mile reach of the San Joaquin between its confluences with the Merced and the Stanislaus, to be toxic to fish about half the time.
Low dissolved oxygen, or DO, in the Stockton Deepwater Ship Channel is attributable to high summer temperatures, low flows, nutrients, and channel configuration; this low DO area is potentially a barrier to fall run Chinook salmon migrating to the Merced, Tuolumne, and Stanislaus rivers to spawn."

Comments concerning the above paragraph:

The statements in this paragraph must be reworded to avoid mischaracterizations of existing conditions. The biological relevance of those statements must be placed in context of the specific locations, timing, magnitude, and duration of the factors discussed. As presently worded, the paragraph is overly simplistic and misleading. For example, naturally warm water temperatures occur during the summer and early fall in the three San Joaquin River tributaries, but cool to suitable levels during the fall and winter (when salmon migrate and spawn) because of a normal decline in ambient air temperatures. The principal dam on the Merced River actually provides cooler water at important times for salmon compared to that which would be naturally available because of deep, hypolimnetic water stored behind the dam. Also, the accuracy of the toxicity discussion is questionable. The citation for the "one study" should be disclosed and the source re-examined to ensure the study results are properly characterized.
Aquatic toxicology studies have been conducted in the mainstem, but the relevance primarily pertained to pesticide runoff and potential effects on food organisms for fish. Our understanding is that the Merced River is a minor source of that pesticide runoff compared to other sources (e.g., agricultural drains on the west side of the valley). As presently worded, the statement implies that the Merced River is a primary source of toxicity which is not true. Additionally, the DO issue in the Deepwater Ship Channel and relevance to salmon migration warrants a more-accurate depiction because the site-specific circumstances may result in a partial barrier during the earliest part of the salmon migration period in some years. As presently worded, the

statement implies that salmon migrate though this region during the summer, the barrier is total (not partial) and that the entire salmon runs are affected.

Thank you for giving the Merced Irrigation District (MercedID) the opportunity to review the draft California Water Plan Update 2005.

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